

Robert J Vanden Bos OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
VANDEN BOS & CHAPMAN, LLP
319 S.W. Washington, Suite 520
Portland, Oregon 97204
TELEPHONE: (503) 241-4869
FAX: (503) 241-3731

Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re) Case No. 16-30406-rld11
)
SeaPort Airlines, Inc.,) MOTION FOR EXPEDITED HEARING ON RE
) DEBTOR'S MOTION TO SUPPLEMENT *NUNC*
) *PRO TUNC* THE INTERIM ORDER RE
) MOTION FOR AN ORDER AUTHORIZING
) PAYMENT OR HONORING OF PREPETITION
) OBLIGATIONS TO TICKET HOLDERS,
) TRAVEL AGENTS AND INTERLINE SALES
) PARTNERS AND OBLIGATIONS FOR BANK
) CHARGES ENTERED ON FEBRUARY 5, 2015
Debtor-in-Possession.) (Docket No. 25)

CERTIFICATION

In compliance with LBR 7007-1(c)(3), Debtor-in-Possession SeaPort Airlines, Inc.'s ("Debtor") attorneys, Douglas R. Ricks ("Counsel"), certifies that he has made a good faith effort to confer with the interested parties regarding the need for an expedited hearing regarding Debtor's Motion to Supplement Nunc Pro Tunc the Interim Order re Motion for an Order Authorizing Payment or Honoring of Prepetition Obligations to Ticket Holders,

Travel Agents and Interline Sales Partners and Obligations for Bank Charges Entered on February 5, 2015 (Docket No. 25) ("Motion").

Debtor's Counsel conferred with and/or forwarded copies of the above Motion as follows:

1. Counsel corresponded with Carla McClurg of the U.S. Trustee's office, by email. Ms. McClurg stated that the U.S. Trustee's office did not oppose an expedited hearing for the above Motion.
2. Copies to the parties listed on the attached **Exhibit A**.

MOTION

Pursuant to FRBP 4001(b)(2), 4001(c)(2), and 9014, Debtor, by and through his attorneys, Vanden Bos & Chapman, LLP, moves the Court for the entry of an order setting an expedited hearing to consider entry of an Order regarding the above Motion. An expedited preliminary hearing is necessary for the reasons stated in Debtor's Motion and summarized as follows:

BACKGROUND

3. Debtor is an Alaska corporation with its principal place of operations in Portland, Oregon that operates a scheduled airline in the United States out of its principal hubs at the Portland International Airport ("PDX") and Memphis International Airport ("MEM"). A regional airline focused on connecting rural communities to the national transportation network, Debtor operates a fleet of five (5) leased aircraft on routes with destinations in El Dorado, Harrison and Hot Springs, Arkansas; Houston, Texas; Memphis, Tennessee; and Pendleton and Portland, Oregon.

4. Due to a change in federal regulations on pilot qualifications, small airlines like Debtor have experienced an extreme attrition in available pilots. As such, Debtor has had to implement a new recruitment and retention plan for its pilots.

5. However, the pilot shortage problem was far greater than Debtor could reasonably accommodate and as a result, Debtor had to cancel service to many areas for its survival. Within the last thirty days, Debtor has had to cease flights to Sacramento, Visalia, Burbank, San Diego and Imperial, California, as well as North Bend, Oregon (effective March 20, 2016); Salina and Great Bend, Kansas; Kansas City, Missouri; and San Felipe, Baja California in Mexico.

6. As a result of the foregoing events, Debtor has seen a drastic reduction in its revenues and is unable to meet its current liquidity needs. In order to implement its planned reorganization, Debtor requires stability with its current revenue streams and payment systems. For that reason Debtor seeks approval of this Motion.

7. In order to maintain stability with its current cash flow and maintain its business relationships, the Debtor must continue to pay its employees, serve its customers and other revenue sources, prevent disruption in its established payment systems, and be able to continue to accept various methods of payment for tickets. The Motion seeks authority authority to supplement the Interim Order Re Motion for an Order Authorizing Payment or Honoring of Prepetition Obligations to Ticket Holders, Travel Agents and Interline Sales Partners and Obligations for Bank Charges Entered on February 5, 2015 (Docket No. 25) to allow Airlines Clearing House, Inc. ("ACH") to continue to process payments and offsets in the ordinary course of business.

8. Irreparable harm will come to the Debtor if the Motion is not heard and granted on an expedited basis. The Motion ensures that validly payments will continue to be processed and that obligations which arise from the Debtor's various sources of business will continue to be honored in the ordinary course. Without the authority requested in the Motion, the Debtor would lose the goodwill of its customers and ticket sales partners to a fatal degree.

WHEREFORE, Debtor requests the Court set a hearing on Debtor's Motion on an expedited basis.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks

Robert J Vanden Bos, OSB #78100

Douglas R. Ricks, OSB #044026

Christopher N. Coyle, OSB #07350

Of Attorneys for Debtor-in-Possession

CERTIFICATE - TRUE COPY

DATE: February 9, 2016

DOCUMENT: MOTION FOR EXPEDITED HEARING ON RE DEBTOR'S
MOTION TO SUPPLEMENT NUNC PRO TUNC THE INTERIM
ORDER RE MOTION FOR AN ORDER AUTHORIZING
PAYMENT OR HONORING OF PREPETITION OBLIGATIONS
TO TICKET HOLDERS, TRAVEL AGENTS AND INTERLINE
SALES PARTNERS AND OBLIGATIONS FOR BANK CHARGES
ENTERED ON FEBRUARY 5, 2015 (Docket No. 25)

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

See Attached List.

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: February 8, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks
Robert J Vanden Bos, OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
Of Attorneys for Debtor-in-Possession

In re SeaPort Airlines, Inc.;
Chapter 11 Bankruptcy Case No. 16-30406-rld11
Service List

First Class Mail:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
7505 NE Airport Way
Portland, OR 97218

Aviall Services, Inc.
Attn: Allison McCullough
P.O. BOX 842267
Dallas, TX 75284
VIA EMAIL:
amccullough@aviall.com

Olson Brooksby PC
Attn: Scott Brooksby
200 Pacific Building
520 SW Yamhill Street
Portland, OR 97204
VIA EMAIL:
sbrooksby@olsonbrooksby.com

Largest 20 Unsecured Creditors:

154 West Aviation Enterprises, Inc.
c/o Kirk A. Hoopingarner Attorney
Partner Quarles & Brady LLP
300 N LaSalle St, # 4000
Chicago, IL 60654
VIA EMAIL:
Kirk.Hoopingarner@quarles.com

City of Memphis, Treasurer
Attn: Angela Washington
Box 185
Memphis, TN 38101
VIA EMAIL:
angelaw@mscaa.com

Petro Marine Services/Alaska
Oil Sales
Attn: Aaron Sperbeck, Esq.
Box 396
Skagway, AK 99840
VIA EMAIL: **asperbeck@bhb.com**

Accounting Principals
Attn: Jonathon Schussler
10151 Deerwood Park Blvd
Bldg 200 Suite 400
Jacksonville, FL 32256
VIA EMAIL:
Jonathan.Schussler@Adeconna.com

DASH CA, Inc.
Attn: Pat Kerrigan
250 St Andrews Way
Lompock, CA 93436
VIA EMAIL:
patkdashca@aol.com

Prime Turbines
Attn: Robert W. Coleman
PO Box 956
Hyannis, MA 02601
VIA EMAIL:
rcoleman@primeturbines.com

Aero Services
Attn: Brooke Walker
1890 Renshaw Way
Juneau, AK 99801
VIA EMAIL:
Brooke.Walker@atlanticaviation.com

Executive Express Aviation, LLC
Attn: Keith Sisson
43W700 US Highway 30
Sugar Grove, IL 60554
VIA EMAIL:
k.sisson@iflysouthern.com

Sabre Group, Inc.
Attn: Russ Perkins
7285 Collection Center Dr.
Chicago, IL 60693
VIA EMAIL: **russ.perkins@sabre.com**

Airline Maintenance Service Inc.
Attn: Erick Larson
1 Terminal Way Suite 302
Nashville, TN 37214
VIA EMAIL:
erick.larson@airlinems.com

Hill Fuel LLC
Attn: Aldwin Harder
Box 808
Hoonah, AK 99829
VIA EMAIL:
hillfuel12@gmail.com

Tom's Aircraft Maintenance
Attn: Tom Jacobson
2641 E. Spring Street
Long Beach, CA 90806
VIA EMAIL: **tom@tomsaircraft.com**

American Express
Attn: Carley Lehr
PO Box 53852
Phoenix, AZ 85072
VIA EMAIL: **Carley.Lehr@aexp.com**

Kenyon International
Emergency Svcs Inc.
Attn: Aldwin Harder
5180 Grand Point Drive
Houston, TX 77090
VIA EMAIL:
wbody@pattersonboyd.com

Travelport, LP
BV c/o Bank of America Lockbox
Attn: Rhonda Shultes
PO Box 402395
Atlanta, GA 30384
VIA EMAIL:
Rhonda.Shultes@travelport.com

Atlantic Burbank
Attn: LaVonne Sears
PO Box 79648
City of Industry, CA 91716
VIA EMAIL:
lavonne.sears@atlanticaviation.com

Lane Powell
Attn: David Hosenpud
1420 Fifth Avenue Suite 4200
Seattle, WA 98111
VIA EMAIL:
HosenpudD@LanePowell.com

U.S. Trustee's Office:

Carla McClurg
US Trustee's Office
620 SW Main Street, Rm 213
Portland, OR 97205
VIA EMAIL:
Carla.McClurg@usdoj.gov

Memphis Propeller Service, Inc.
Attn: Leslie Davis
11098 Willow Ridge Drive
Olive Branch, MS 38654
VIA EMAIL:
Leslie@memphispropeller.com

Electronic Mail:

The foregoing was served on all
CM/ECF participants through the
Court's Case Management/ Electronic
Case File system.